

**American Cyanamid Company** 

600 North Jones Street Fort Worth, TX 76106 (817) 332-2127

August 4, 1981

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S & A DIVISION

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CERTIFIED MAIL Return Receipt Requested

Sites Notification Region VI U. S. Environmental Protection Agency 1201 Elm Street Dallas, TX 75270

American Cyanamid Company TXD 008 017 261

Fort Worth Plant

Dear Sir:

Cyanamid submitted a Notification of Hazardous Waste Site (EPA Form 8900-1) on June 1, 1981 based on an on-site inactive disposal area which we believed to contain RCRA hazardous waste. Subsequent review of this situation, however, indicates that the waste disposal in this area is not RCRA hazardous and we, therefore, wish to withdraw our Notification.

In option 2 of Item E and items F, G, H and I, we specifically made reference to 25 to 50 partially filled buried drums believed to contain off-grade catalyst product contaminated with vanadium. This specific waste was included in the Notification on the basis of the vanadium pentoxide used in the production process and the waste was given the designation P-120, which denotes discarded vanadium pentoxide. Subsequent review of the RCRA regulations indicates that: (a) the waste is not pure or off-specification vanadium pentoxide and should not be designated as P-120, (b) waste from the on-site production process is not a listed hazardous waste (Sections 261.31 to 261.33), and (c) the specific waste does not have any of the 4 hazardous waste characteristics (Sections 261.21 to 261.24).

Based on these facts, we request that our Superfund site Notification be withdrawn. Please advise if there are any questions.

> Very truly yours,

SUPERFUND FILE

JUL 3 0 1992

Hershel J. Mitchell Acting Plant Manager

REORGANIZED